

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

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STEVES AND SONS, INC.,

Plaintiff,

v.

JELD-WEN, INC.,

Defendant.

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) Civil Action No. 3:16-cv-545-REP  
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**JELD-WEN, INC.’S MOTION TO FILE UNDER SEAL**

JELD-WEN, Inc. (“JELD-WEN”), pursuant to Rule 5 of the Local Civil Rules, respectfully moves the Court for an order to file under seal its Memorandum in Support of its Motion to Modify the Amended Final Judgment Under Federal Rule of Civil Procedure 60(b)(5) as well as the related Exhibits (collectively, the “Memorandum”).

The Memorandum contains confidential and commercially sensitive information. In particular, it discusses the general history of the divestiture process as well as specific bidders’ offers. The Memorandum also contains references to the Special Master’s Report and Recommendation and its Exhibit A, which were redacted in significant part on the public docket pursuant to this Court’s order. *See* Dkt. 2188. Finally, the Memorandum also discusses the February 14, 2024 status conference hearing and accompanying handouts, which are filed under seal, Dkt. 2442-43.

Furthermore, the Memorandum discusses commercially sensitive information: the terms of the doorskin supply agreements between JELD-WEN and Steves and Sons, Inc. (“Steves”);

discussion of JELD-WEN's (and the Towanda plant's) doorskin production, sales, capacity, and operations; Steves' doorskin purchases; and information about Steves' business plans.

It is clear that the document would not enhance the public's understanding of any important historical event and, because of the confidential nature of the divestiture process and business information, the public does not already have access to the information contained in the filing. Neither is there a less drastic alternative to sealing the document, as all of the material contained in the filing reveals or references confidential and commercially sensitive information.

As further grounds for this motion, JELD-WEN refers to its Memorandum in Support of this Motion, filed contemporaneously.

May 1, 2024

Respectfully submitted:

JELD-WEN, Inc.

By counsel

/s/ Brian Riopelle

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**CERTIFICATE OF SERVICE**

I certify that on the 1st day of May 2024, I electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the registered participants as identified on the NEF to receive electronic service.

/s/ *Brian Riopelle*

Brian Riopelle (VSB #36454)